



ATOFINA Chemicals, Inc.

January 26, 2001

Dr. Scott Masten
NIEHS/NTP
P.O. Box 12233
Research Triangle Park, NC 27709

RE: Request for Comments on Substances Nominated to the National Toxicology Program (NTP) for Toxicological Studies and on the Testing Recommendations Made by the NTP Interagency Committee for Chemical Evaluation and Coordination. 65 FR 75727, 4 December 2000.

Methyltin trichloride, dimethyltin dichloride, butyltin trichloride, dibutyltin dichloride

Dear Dr. Masten:

In response to the NTP request for comments on the list of chemical substances recommended for testing, I would like to inform you of a substantial testing program that is ongoing, sponsored by the Organotin Environmental Programme (ORTEP) Association. ORTEP is an international organization comprised of manufacturers of organotin stabilizers and intermediates.

As chair of the ORTEP Toxicology Work Group, I would like to acknowledge that ORTEP members have sponsored a number of health and environmental studies for these compounds during the past 25 years. Currently, ORTEP has committed to provide the information requested under the voluntary EPA program to assess high production volume (HPV) chemicals. As a result of this commitment, the existing information and all new data developed by ORTEP will be made publicly available through participation in the International Council of Chemical Association (ICCA) HPV Initiative. EPA has agreed to act as the sponsor for these materials in the OECD SIDS process. The chemicals volunteered are listed in Table 1.

The list includes the four organotin materials (methyltin trichloride, dimethyltin dichloride, butyltin trichloride, and dibutyltin dichloride) that are included in the list of substances nominated for testing by the NTP. Current plans include providing existing data or generating data to assess subchronic oral toxicity and potential for developmental toxicity of these materials. Ninety day oral studies and developmental toxicity studies in rats are to be provided. The new studies to be conducted will use the latest EPA and OECD guidelines which include assessment of the reproductive organs and neurological parameters. The studies for these HPV materials are scheduled to start in 2001, and test plans for the program are under development now. They will be posted soon on the ICCA public tracking system. The ORTEP Association would welcome the opportunity to discuss these testing plans with you. We hope that we can prevent unnecessary duplication of effort and maximize the utility of the studies that are already planned.

Please feel free to contact me at 215 419-5892 if you have any questions about the information in this letter. We look forward to future dialogue.

Sincerely,

Craig H. Farr, PhD, DABT
Associate Director, Product Stewardship
and Toxicology

attachment



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Chemical Name	CAS Number
Butyltin trichloride	1118-46-3
Butyltin tris (2-ethylhexylmercaptoacetate)	26864-37-9
Butyltin tris (iso-octylmercaptoacetate)	25852-70-4
Dibutyltin bis (2-ethylhexylmercaptoacetate)	10584-98-2
Dibutyltin bis (iso-octylmercaptoacetate)	25168-24-5
Dibutyltin dichloride	683-18-1
Dibutyltin dilaurate	77-58-7
Dibutyltin maleate	78-04-6
Dibutyltin oxide	818-08-6
Dimethyltin bis (2-ethylhexylmercaptoacetate)	57583-35-4
Dimethyltin bis (iso-octylmercaptoacetate)	26636-01-1
Dimethyltin dichloride	753-73-1
Methyltin trichloride	993-16-8
Methyltin tris (2-ethylhexylmercaptoacetate)	57583-34-3
Methyltin tris (iso-octylmercaptoacetate)	54849-38-6
Tetrabutyltin	1461-25-2
Tributyltin chloride	1461-22-9
Tin tetrachloride	7646-78-8